



Maricopa County

Air Quality Department

AIR QUALITY DEPARTMENT

1001 North Central Avenue

Phoenix, AZ 85004

AF Lorts Manufacturing Company Inc
ATTN: TY Lorts
15836 W Eddie Albert Way
Goodyear, AZ 85338

The purpose of the letter is to inform you that the application for a permit renewal has been approved and will be incorporated into Air Quality Permit 060060. The applicable Permit Conditions are enclosed with this letter.

If you need assistance with the permit, please contact the Small Business Assistance Coordinator office at 602.506.5102 or contact the undersigned at 602.506.7248. Email communications may be sent to AQPermits@mail.maricopa.gov.

MARICOPA COUNTY AIR QUALITY DEPARTMENT

Engineering and Permitting Division

1001 N. Central Avenue, Suite 400, Phoenix, Arizona 85004

Phone: (602) 506-6010

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AIR QUALITY PERMIT TO OPERATE AND/OR CONSTRUCT

(As required by Title 49, Chapter 3, Article 2, Section 49-480, Arizona Revised Statutes)

A R I Z O N A
ISSUED TO

AF Lorts Manufacturing Company Inc
15836 W Eddie Albert Way
Goodyear, AZ 85338

This air quality permit to operate and/or construct does not relieve the applicant of the responsibility of meeting all air pollution regulations.

THE PERMITTEE IS SUBJECT TO THE SPECIFIC AND GENERAL CONDITIONS IDENTIFIED IN THIS PERMIT.

PERMIT NUMBER: 060060

REVISION DATE: xx/xx/xxxx

REVISION NUMBER: 2.0.0.0

EXPIRATION DATE: 02/28/2022

Todd Martin, Non-Title V Permit Supervisor

TABLE OF CONTENTS

<u>SPECIFIC CONDITIONS</u>	1
1. Allowable Emissions:	1
2. Opacity:	1
3. Volatile Organic Compound (VOC) Limits:	1
4. Controls:	2
5. Spray Method Requirements:	2
6. Exemptions:	3
7. Cleanup and Cleaning of Supply and Application Equipment:	3
8. Handling and Disposal of VOC:	4
9. Recordkeeping and Reporting:	4
10. Standards:	5
<u>GENERAL CONDITIONS</u>	6
11. Posting of Permit:	6
12. Compliance:	6
13. Malfunctions, Emergency Upsets, and Excess Emissions:	6
14. Revision / Reopening / Revocation:	6
15. Records:	6
16. Right to Entry:	7
17. Severability:	7

Any cited regulatory paragraphs or section numbers refer to the version of the rules and regulations that were in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise. However, in the event the rules and regulations are amended during the term of this Permit, the amended rules and regulations shall apply to this Permit. Whenever the term, Control Officer, is used in this Permit it shall be interpreted to mean, Control Officer or designated representative. Where the term "Rule" appears, it shall be construed to mean "Maricopa County Air Pollution Control Regulations" unless otherwise noted.

SPECIFIC CONDITIONS

1. Allowable Emissions:

The Permittee shall not allow emissions into the atmosphere to exceed any of the following limits:

Table 1: Facility Emission Limits

Pollutant	Twelve Month Rolling Total Emission Limits (tons per year)
VOLATILE ORGANIC COMPOUNDS (VOC)	90.0
SINGLE HAZARDOUS AIR POLLUTANT (HAP)	1.0
TOTAL HAPs	2.5
PARTICULATE MATTER <10 MICRON DIAM. (PM ₁₀)	6.0
PARTICULATE MATTER <2.5 MICRON DIAM. (PM _{2.5})	6.0
TOTAL SUSPENDED PARTICULATE (TSP=PM ₁₀)	6.0

The 12-month rolling total emissions shall be calculated monthly within 30 days following the end of each calendar month by summing the emissions over the most recent 12 calendar months. The Permittee shall calculate VOC emissions on a weekly basis when the 12 month rolling total reaches 70 tons. The Permittee shall calculate VOC emissions on a daily basis when the 12 month rolling total reaches 85 tons. The Permittee shall submit a monthly rolling total Emissions Report by July 31 of each year for the prior 6-month period of January through June, and by January 30 of each year for the prior 6-month period of July through December. The Permittee shall keep this emission report on-site for inspection or submittal upon request

[Rule 220, §302.2, locally enforceable only]

2. Opacity:

No person shall discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20% opacity for a period aggregating more than three minutes in any 60-minute period.

- If any non-compliant visible emissions (excluding water vapor) are detected or reported, the Permittee shall determine the cause and/or the source of emissions. The Permittee shall then take immediate corrective action(s) and if necessary, shut down the applicable equipment. If visible emissions (excluding water vapor) exceed the above opacity standards subsequent to implementing corrective action(s), the Permittee shall shut down the applicable equipment and institute repairs or changes necessary to ensure compliance prior to resuming operations.
- Compliance with the opacity requirement shall be determined by observations of visible emissions conducted in accordance with EPA Reference Method 9 as modified by EPA Reference Method 203B.

[Rule 300 §§301, 501]

RULE 342 – COATING WOOD FURNITURE AND FIXTURES LARGER THAN 10 TPY VOC (WITHOUT ECS AND VOC AVERAGING)

3. Volatile Organic Compound (VOC) Limits:

The Permittee shall follow the below VOC limits for coatings:

Table 2: VOC Limits of Coatings

Type of Coating	VOC Limit
Topcoat	1.37 (lbs VOC/lb solids)*
Sealer	1.39 (lbs VOC/lb solids)*
Strippable Booth Coating	0.05 (lbs VOC/lb solids)*
Low Solids Stain (less than 1.0 lb solids/gallon)	2.9 (lbs VOC/gallon)
High Solids Stain (greater than 1.0 lb solids/gallon)	2.9 (lbs VOC/lb solids)*

- As applied, less water and exempt compounds.
- a. Washcoats, glazes, toners, inks, and other coatings not specified in Table 2 of these Permit Conditions, do not have limits on VOC content unless they are limited by the site's BACT determination.
[County Rule 342 §301.2][SIP Rule 342 §301.2][County Rule 241, locally enforceable only]
- b. The Permittee shall provide "as applied" samples of coatings listed in Table 2 upon the request of the Department.

4. Controls:

The Permittee shall comply with the following controls:

- a. The Permittee shall conduct all spray coating operations inside of a painting enclosure.
[Rule 315 §301][Locally Enforceable Only]
- b. Equipment Operated In Enclosures Located Outside a Building: Spray coating equipment shall be operated inside an enclosure which has at least three sides a minimum of eight feet in height and able to contain any object or objects being coated.
 - i. Three-Sided Enclosures: Spray shall be directed in a horizontal or downward pointing manner so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.
 - ii. More Complete Enclosures: For enclosures with three sides and a roof or complete enclosures, spray shall be directed into the enclosure so that the overspray is directed away from any opening in the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of any open top of the enclosure.
[Rule 315 §301.1][Locally Enforceable Only]
- c. Any spray booth or enclosure with forced air exhaust vented directly outside shall be equipped with exhaust filters which are certified by the manufacturer and accepted by the Control Officer as having a minimum over spray removal efficiency of at least 92% for similar types of applications. The Permittee shall install and maintain the exhaust filters in accordance with the manufacturer's recommendations, with no gaps or visible openings. The exhaust from such paint booths shall be directed vertically up into the atmosphere.
[Rule 315 §301.2; Rule 320 §303][Locally Enforceable Only]

5. Spray Method Requirements:

- a. Evidence of Transfer-Efficient Spray Equipment: The Permittee shall not spray wood furniture with coating exceeding 1 lb VOC/lb solids (1 kg VOC/kg solids) without providing evidence of possession and use of a low pressure spray gun or system, an electrostatic system, or a system in which the energy for atomization is provided principally via hydraulic pressure; this includes air assisted airless and ultra-low-volume-air assisted technologies. Such requirement does not apply to any facility, activity or person specifically exempted by Permit Condition 6, or to any specific system which is approved by the Administrator as having a transfer efficiency consistently exceeding 64%.
[SIP Rule 342 §302.1]
- b. Limitation of Air-Atomized Spray Other Than Low Pressure: The Permittee shall not use a conventional air-atomized spray gun or other restricted use gun, except:
 - i. To apply finishing materials that have a VOC content not exceeding 1.0 lb VOC/lb solids (1.0

kg/kg).

ii. For touch-up and repair under either of the following conditions:

- 1) Such application is performed after completion of the entire finishing operation; or
- 2) Such application is performed after applying stain, and before any further coating, by equipment having a total capacity not exceeding 2.1 gallons (8 liters).

[SIP Rule 342 §302.2]

c. Using a Conventional or other Restricted Gun Identified by a Red Tag: The Permittee may use a conventional air-atomized or other restricted gun to apply coatings exceeding 1 lb VOC/lb solids only if all the following conditions are met:

- i. The volume of such coating applied in this way is less than 5% of the total volume of coating applied at the facility.
- ii. Each gun always has a red tag when applying coatings exceeding 1 lb/lb solids. The Permittee shall use a red 4 square-inch vivid, durable tag, sticker, or painted emblem/label visible on the gun or within 3 ft of the gun on the gun's hose to meet the red tagging requirements.
- iii. A log shall be kept of the amount of coating used by each such gun. This shall be done daily or each time coating is added to the gun's coating reservoir; and semi-annual calculation shall be made.

[SIP Rule 342 §§307.2.e, 403]

6. Exemptions:

- a. Adhesives, architectural coatings, printing ink, and coatings not applied on or over a wood-product substrate are exempt from all requirements of this Permit Section.
- b. Coatings in aerosol spray cans not exceeding 22 fl. oz. (0.66 liter) capacity used exclusively for touch-up and/or repairs are subject only to the recordkeeping requirements in [Permit Condition 9](#).
- c. The following are exempt from Permit [Condition 3](#) and [Permit Condition 5](#):
 - i. Refinishing, replacement, and custom replica furniture operations: Any refinishing operation necessary for preservation, to return the furniture or fixture to original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture.
 - ii. Limit Amount: The use of the following coating types when the annual total use of all such types together is less than 250 gallons (948 liters): prepackaged aerosol spray cans which are not used for touch-up or repair; metal leaf finishes; and faux finishes.
- d. The coating for a single resin-layer finish which does not exceed a VOC limit of 3 lbs VOC/lb solids for completed finishes up to 3 dry mils thickness or does not exceed 2.3 lbs/lb solids for finishes over 3 dry mils is exempt from the VOC-limits of [Permit Conditions 3](#) if all of the following conditions are met:
 - i. The containers are clearly marked "FOR USE IN SINGLE RESIN-LAYER FINISH";
 - ii. Facility records clearly identify this material: "DOES NOT MEET THE VOC LIMITS OF SECTION 301, RULE 342. - FOR USE ONLY IN SINGLE RESIN-LAYER FINISHES"; and
 - iii. The booth used to apply a single resin-layer finish above 2.3 lbs VOC/lb solids is dedicated to that operation only, and is clearly labeled "FOR SINGLE RESIN-LAYER FINISHES ONLY".

[SIP Rule 342 §307]

7. Cleanup and Cleaning of Supply and Application Equipment:

- a. Booth Cleaning: The Permittee shall not clean spray booth components using a solvent containing more than 8.0 percent by weight of VOC, including water and non-precursor compounds, except for: conveyors; continuous coaters and their enclosures; and metal filters. If the spray booth coating is being replaced, the Permittee shall use no more than 1.0 gallon (3.8 liters) VOC-solvent to clean the booth.

- b. Cleaning Guns and Lines: The Permittee shall collect all solvent used to clean spray guns and shall pump or drain all solvent used for line cleaning into non-leaking container(s). Such containers shall be immediately closed or covered after all the solvent has been collected, and shall remain so except when in use.

[SIP Rule 342 §304]

8. Handling and Disposal of VOC:

- a. Use and Storage: The Permittee shall cover and keep covered each VOC-containing material intended for the day's production, which is not currently in use. The Permittee shall store finishing and cleaning materials in closed containers.
- b. Disposal of VOC and VOC-Containing Material: The Permittee shall store all VOC-containing materials, including, but not limited to, rags, waste coatings, waste solvents and their residues, in closed containers which are legibly labeled with their contents and which remain covered when not in use.

[SIP Rule 342 §305]

- c. The Permittee shall operate and maintain in proper working order all process equipment in which VOC-containing materials are used or stored.

[SIP Rule 342 §303]

9. Recordkeeping and Reporting:

The Permittee shall keep the following records and lists in a consistent and complete manner and shall make them available to the Control Officer without delay during normal business hours. Each record shall be maintained a minimum of five years.

- a. Current List:
 - i. VOC-containing materials: A current list of all VOC-containing material shall be maintained which contains their name or code and their VOC content. Any qualified single resin-layer finish shall be identified as such.
 - ii. How to express VOC content:
 - 1) Non-coatings: Use grams VOC/liter or lbs VOC/gal. for reducers, thinners, cleaners, etc.
 - 2) Stains: Use lbs VOC/gallon for low solids stain (less than 1.0 lb solids/gallon) and for high solids stain (greater than 1.0 lb solids/gallon) use lbs VOC/lb solids.
 - 3) Topcoats and Sealers: Use lbs VOC/lb solids.
 - 4) Other Coatings: Use g VOC/liter (lbs VOC/gal), or lbs VOC/lb solids for coatings that are neither sealers nor topcoats, such as washcoats, glazes, etc.
 - iii. VOC-containing materials shall be listed neatly and completely.
 - iv. Mix Ratios: A current list shall be maintained of the manufacturer's recommended mix ratio of components, including but not limited to adding reducers and catalyst/hardeners, except when the manufacturer has no recommendations for any additions.
- b. Schedule for Recording Material Usage:
 - i. Daily Updates for Non-Compliant Material: The amount of each day's use of each topcoat, sealer or booth material that exceeds applicable VOC limits of Permit Conditions 3 and 7 shall be totaled and logged by the end of the following workday. The VOC content shall be entered for each such material.
 - ii. Monthly Update for Materials Compliant with Permit Conditions 3 and 7: By the end of the following month, the Permittee shall update the following records for each month:
 - 1) For each topcoat and sealer to which reducer is added at any time after its arrival at a facility, enter the VOC content in lbs VOC/lb solids or in g/liter (lbs/gal) less water and non-precursor organic compounds.

- 2) The amount of coating, the amount of catalyst/hardener, and the amount of reducer/coating diluent used.
 - 3) The quantity and type of organic solvent used each month for stripping and cleaning.
 - 4) The quantity of organic solvent disposed of offsite during the month just ended.
 - 5) Exception: Update yearly the totals of the usage of each VOC containing material known to be used in amounts less than 15 gallons (57 liters) per year.
- iii. Semi-Annual Updates of Coatings Applied with Restricted Use Gun: Records associated with the Permit Condition 3 limitations on the use of conventional air-atomized spray equipment and other restricted-use guns shall be kept. These records shall show for each semi-annual period the volume of finishing materials exceeding solids (1 lb VOC/lb solids) (1 kg VOC/kg solids) applied with conventional air-atomized spray guns and other restricted use guns. In addition, the total volume of all finishing material used throughout the facility shall be determined. The total volume so applied over the previous six months is divided by the total of all coatings used in the same period and these calculations and the result are entered in the log.
- c. Disposal/Recovery: The Permittee shall keep records of disposal/recovery of all VOC-containing materials.
[SIP Rule 342 §501]
- d. Records of the 12-month rolling total emissions required by Permit Condition 1
[Rule 220 §302.7][Locally Enforceable Only]

RULE 320 – ODOR CONTROL EQUIPMENT

10. Standards:

No person shall emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.

[Rule 320 §300]

- a. Material Containment Required: Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air in such quantities or concentrations as to cause air pollutions smells, aromas or stench commonly recognized as offensive, obnoxious or objectionable to a substantial part of a community. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices or equipment shall be mandatory.
[Rule 320 §302]
- b. Reasonable Stack Height Required: Where a stack, vent or other outlet is at such a level that air contaminants are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet to a degree that will adequately dilute, reduce or eliminate the discharge of air contaminants to adjoining property.
[Rule 320 §303]

GENERAL CONDITIONS**11. Posting of Permit:**

This Permit shall be posted in a clearly visible and accessible location on the site where the equipment is installed.

[Rule 200 §312]

12. Compliance:

- a. The issuance of any Permit or Permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a Permit or Permit revision required under the County Rules.

[Rule 200 §309][Rule 220 §406.3][Locally Enforceable Only]

- b. The Permittee shall comply with all conditions of this Permit including all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations now in effect and as amended in the future. Any Permit noncompliance is grounds for enforcement action, Permit termination or revocation, or for denial of a renewal application. In addition, non-compliance with any federally enforceable requirements constitutes a violation of the Clean Air Act.

[A.A.C. R18-2-306.A.8.a][Locally Enforceable Only]

- c. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with these Permit Conditions.

[Rule 220 §302.10][A.A.C. R18-2-306.A.8.b][Locally Enforceable Only]

- d. Rights and Privileges: This Permit does not convey any property rights or exclusive privilege of any sort.

[Rule 220 §302.12][Locally Enforceable Only]

- e. Fees: The Permittee shall pay all fees to the Control Officer in accordance with Rule 280. No permit or permit revision is valid until the applicable permit fee has been received and until the permit is issued by the Control Officer.

[Rule 200 §409][Rule 280 §302][A.R.S. 49-480(D)][SIP Rule 28]

13. Malfunctions, Emergency Upsets, and Excess Emissions:

An affirmative defense of an emergency, excess emission, and/or during startup and shutdown shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence as outlined in Rule 130 for emergencies and Rule 140 for excess emissions.

[Rule 130 §§201, 400][Rule 140 §§400, 500][SIP Rule 140]

14. Revision / Reopening / Revocation:

The Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[Rule 220 §302.11][Locally Enforceable Only]

15. Records:

- a. The Permittee shall furnish information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. The information shall be provided in a timeframe specified by the Control Officer. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator along with a claim of confidentiality.

[Rule 220 §302.13][SIP Rule 40]

- b. If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source

after the date a complete application is filed but prior to release of a proposed permit. Willful misrepresentation of facts in a permit application is cause for revocation or denial of a permit.

[Rule 220 §§301.5, 301.6][Locally Enforceable Only]

16. Right to Entry:

- a. The Control Officer during reasonable hours, for the purpose of enforcing and administering County or SIP Rules or the Clean Air Act, or any provision of the Arizona Revised Statutes relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under A.R.S. 49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.
- b. The Permittee shall allow the Control Officer or his designated representatives, upon presentation of proper credentials (e.g., Maricopa County Air Quality Department identification) and other documents as may be required by law, to:
 - i. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept pursuant to the conditions of the permit;
 - ii. Have access to and copy, at reasonable times, any records that are required to be kept pursuant to the conditions of the permit;
 - iii. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;
 - iv. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the Permit or other applicable requirements; and
 - v. To record any inspection by use of written, electronic, magnetic, and photographic media.

[Rule 100 §105][Rule 220 §302.17-21][SIP Rule 43]

17. Severability:

The rules, paragraphs, clauses, provisions, and/or sections of this Permit are severable, and, if any rule, paragraph, clause, provision, and/or section of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

[Rule 220 §302.9][SIP Rule 80]

Equipment List

AF LORTS MANUFACTURING COMPANY INC

Permit Number 060060

Date Issued: 02/02/07

Revision: 2.0.0.0

Equipment Description	Rated Capacity	Quantity Exist/Future
COATING EQUIPMENT		
1. SPRAY BOOTH - 20' X 8' X 9' WITH 97% EFFICIENCY FILTER	27,000.00 CFM	16 /
2. SPRAY GUN		16 /
3. GUN CLEANER		16 /
WOOD WORKING EQUIPMENT		
1. TABLE SAW	5.00 HP	1 /
2. MITER SAW - POWER	1.50 HP	1 /
3. BAND SAW	3.00 HP	1 /
4. BELT SANDER	.75 HP	2 /